



Danny Powers
Air Quality Program Manager
Southern Ute Indian Tribe
P.O. Box 737
356 Ouray Drive,
Ignacio, CO 81137

1/12/2018

Dear Mr. Powers:

The Colorado Department of Public Health and Environment (CDPHE), Air Pollution Control Division (APCD) is currently evaluating calendar year 2017 ambient ozone data for potential stratospheric ozone intrusion events and wildfire smoke events that may be considered for Exceptional Event status as defined by the Code of Federal Regulations (CFR) Title 40 Parts 50 and 51. The APCD has identified five stratospheric intrusion events in 2017, of which, three appear to have significantly affected the Southern Ute Indian Tribe's Ignacio and Bondad ozone monitors.

The Exceptional Event Rule (EER) was published March 22, 2007 and became effective May 21, 2007. The EER allows the ambient air quality data which is submitted to AQS and used in making regulatory decisions, to be, in some cases, flagged and, where appropriate, excluded from calculations in determining whether or not an area has attained the standard. As these tribally operated ozone analyzers are, or may be designated as regulatory analyzers, Colorado may be held liable for making National Ambient Air Quality Standards (NAAQS) determinations from data collected by these analyzers for surrounding non-tribal areas. The data flagged as "exceptional" must have been affected by an exceptional event, which is defined as an event that affects air quality, is not reasonably controllable or preventable, is an event caused by human activity that is unlikely to recur at a particular location or a natural event, and is determined by the EPA, in accordance with 40 CFR 50.14, to be an exceptional event. Ultimately, only flagged events that may affect the designation status of an area will be considered for justification documentation.

Stratospheric ozone intrusion events are forecasted and documented by APCD meteorologists for public advisories. Once an event is verified and data is validated, all 1 hour average data associated with the forward looking 8 hour averages in excess of 70 ppb are flagged with an "IO" informational flag in AQS. Additional 1 hour data points occurring prior to the 1 hour points associated with 8 hour averages in excess of 70 ppb may be identified to further clarify the start of the event. Data from these tribally operated ozone monitors were obtained from AQS and evaluated using the same criteria as data from APCD monitors. The following date/time ranges from the Ignacio and Bondad ozone monitoring sites, as identified by the APCD, have been influenced by a stratospheric ozone intrusion event and can be appropriately flagged in AQS with "IO" (Stratospheric Ozone Intrusion) informational flags. The APCD does not have the AQS screening group clearance to add informational flags to data collected at tribal air monitoring sites and requests that the Tribe consider flagging these data.

Stratospheric Ozone Intrusion Events ("IO" Request Informational Flag)

4/22/17 Event

Ignacio	(08-067-7001)	4/22/17, hour 11	to	hour 20	8hr Avg: 73 ppb
Bondad	(08-069-7003)	4/22/17, hour 8	to	hour 19	8hr Avg: 71 ppb



5/23/17 Event

Ignacio	(08-067-7001)	5/23/17, hour 10	to	hour 20	8hr Avg: 74 ppb
Bondad	(08-069-7003)	5/23/17, hour 9	to	hour 18	8hr Avg: 72 ppb

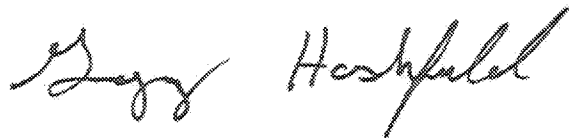
6/3/17 Event

Ignacio	(08-067-7001)	6/3/17, hour 10	to	hour 18	8hr Avg: 71 ppb
Bondad	(08-069-7003)	6/3/17, hour 9	to	hour 19	8hr Avg: 72 ppb

In the past (2007 - 2015) the APCD recommended the use of "RO" and "RT" exclusion flags to identify all stratospheric and wildfire smoke ozone events. The use of these flags also required the inclusion of an event description in AQS. This is no longer required when initially identifying events for informational purposes. EPA is now requesting that "IO" and "IT" informational flags be added when initially identifying events. The EPA has not mandated the use of informational flags, however the APCD recognizes the advantages of using them as a way to publicly identify data affected by exceptional events and for their use as placeholders for potential exclusion flags. Conversion of the "IO" and "IT" informational flags to the "RO" and "RT" exclusion flags along with the inclusions of an event description will be required if the Tribe elects to submit justification documentation to EPA for concurrence. If elected, this conversion of informational flags to exclusion flags would occur at a later date by the Tribe.

The APCD is offering this information to the Southern Ute Indian Tribe as a courtesy, and the decision to flag this data resides solely with the Tribe. The APCD appreciates your consideration in these matters. Please feel free to contact me with questions or comments.

Regards,



Gregory Harshfield
Colorado Department of Public Health and Environment
APCD-TS-B1
4300 Cherry Creek Drive South
Denver, CO 80246
gregory.harshfield@state.co.us
303-692-3232

cc:

Richard Payton	EPA Region 8
Joshua Rickard	EPA Region 8
Gordon Pierce	CDPHE/APCD
Scott Landes	CDPHE/APCD
Cindy Wike	CDPHE/APCD
Lisa Devore	CDPHE/APCD

